## 

Case 1:20-cr-00521-CM Document 211 Filed 05/25/22 Page 1 of 1

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE (212) 482-1303 FAX WWW.TALKINLAW.COM EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE: 5100 DORSEY HALL DRIVE SUITE 100 ELLICOTT CITY, MD 21042 NEW JERSEY OFFICE: 2500 PLAZA 5 HARBORSIDE FINANCIAL CENTER JERSEY CITY, NJ 07311

201-342-6665

May 25, 2022

APPLICATION GRANTED SO ORDERED

Honorable Colleen McMahon Chief United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

BY ECF

John G. Roem, C.S.D.J.

Re:

<u>United States v. James Cahill</u> 20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully permission to travel from his home in Rockland County to his home in Long Beach, New York on May 31, 2022 from 9:00 am to 9:00 pm (travel time included) so that he can monitor his winter tenant moving out, clean the house and prepare it for the summer. Pretrial Services ("PTS"), by United States Pretrial Service Officer Andrew Abbott, does not object to this application and the government, by Assistant United States Attorney Jason Swergold, defers to PTS' position on this application.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Jason Swergold
AUSA Jun Xiang (by ECF)
AUSA Danielle Sassoon (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Andrew Abbott (by email)